

1 J Christopher Jorgensen, Bar No. 5382
 2 CJorgensen@lewisroca.com
 3 Brittni A. Tanenbaum, Bar No. 16013
 4 BTanenbaum@lewisroca.com
LEWIS ROCA ROTHGERBER CHRISTIE LLP
 5 3993 Howard Hughes Parkway, Suite 600
 Las Vegas, NV 89169
 Tel: 702.949.8200
 Fax: 702.949.8398

6 *Attorneys for Defendant Coinbase, Inc.*

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8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9 KENNETH LIEBSCHER, an individual,

10 Plaintiff,

11 v.

12 COINBASE, INC., a Delaware corporation;
 13 Does I through X, inclusive; and ROE
 14 ENTITIES XI through M, inclusive,

15 Defendant.

Case No. 2:24-cv-00148-RFB-EJY

**UNOPPOSED MOTION FOR
 EXTENSION OF TIME
 (FIRST REQUEST)**

16 Pursuant to Fed. R. Civ. P. 6(b) and LR IA 6-1, Defendant Coinbase, Inc. (“Coinbase” or
 17 “Defendant”), by counsel, respectfully requests a twenty-eight (28) day enlargement of the time to
 18 respond to the Complaint of Plaintiff Kenneth Liebscher in this action (“Plaintiff”). In support
 19 thereof, Coinbase states:

20 1. On August 28, 2023, Plaintiff filed his Complaint in the Eighth Judicial District
 Court in and for Clark County, Nevada.

21 2. On December 21, 2023, Coinbase was served with the Complaint.

22 3. On January 22, 2024, Coinbase timely removed the action to this Court. ECF No. 1.

23 4. The undersigned was just recently retained in this action, and requires additional
 24 time to investigate all relevant matters, ascertain the veracity of the averments in Plaintiff’s
 25 Complaint, analyze and ascertain any and all affirmative and other defenses, and otherwise submit
 26 a proper response to the Complaint. In addition, the requested enlargement of time will permit
 27 Defendant to identify the account and complete its research. For these reasons, Defendant

respectfully requests a twenty-eight (28) day extension of time -- i.e., through and including February 26, 2024 -- within which to respond to Plaintiff's Complaint.

5. This motion is made in good faith and not for purposes of undue delay. No party will be prejudiced by the relief sought. This is Defendant's first request for extension of time.

6. Counsel for Defendant conferred with counsel for Plaintiff regarding the extension of time requested herein, who confirmed that Plaintiff does not oppose the relief sought.

WHEREFORE, Defendant Coinbase respectfully requests that the Court grant this Unopposed Motion and extend the time for Coinbase to respond to the Complaint by and through February 26, 2024.

DATED this 23rd day of January, 2024.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Brittni A. Tanenbaum

J Christopher Jorgensen (SBN: 5382)

Brittni A. Tanenbaum (SBN: 16013)

3993 Howard Hughes Parkway, Suite 600

Las Vegas, NV 89169

Attorneys for Defendant Coinbase, Inc.

ORDER

IT IS SO ORDERED.

Elyna J. Zouchah
UNITED STATES MAGISTRATE JUDGE

DATE: January 23, 2024